## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

ENRIQUE PASPUEL,

and

JULIO PASPUEL,

PLAINTIFFS,

MOTION FOR JUDGMENT OF DEFAULT
AND REQUEST FOR INQUEST ON
DAMAGES PURSUANT TO FRCP 55(b)(2)

V.

PRO STAR TRUCKING, LLC.

DEFENDANT.

Plaintiffs, Enrique Paspuel and Julio Paspuel, by and through their undersigned counsel, move for a default judgment against Defendant, Pro Star Trucking LLC, as to liability. In support of this motion, Plaintiffs refer to and incorporate the Complaint in this matter, docket entry 2, the Summons, returned executed, docket entry 9, Plaintiffs' Motion for Entry of Default, and supporting documents, docket entry 10, the Clerk's Entry of Certificate of Default, docket entry 11, and the attached Proposed Order form of default judgment.

Plaintiffs further move this Court pursuant to FCP 55(b)(2) for an inquest as to damages, attorneys' fees and costs, in connection with the default entry against Pro Star Trucking LLC.

Dated: June 26, 2015

Mamaroneck, NY 10543

Respectfully Submitted,

Law Offices of Joshua Friedman

By: <u>/s/ Rebecca Houlding</u>
Rebecca Houlding
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Strindberg & Scholnick, LLC

By: \_\_\_/s/ Kass Harstad Kass Harstad, Esq. 675 East 2100 South, Suite 350 Salt Lake City, UT 84106 801.359.4169 (tel) 801.359.4313 (fax) kass@utahjobjustice.com **CERTIFICATE OF SERVICE** 

I, Rebecca Houlding, certify that on this 26th day of June, 2015, I served the instant Motion for

Default Judgment on Defendant, Pro Star Trucking, LLC, and Proposed Order, by placing an exact

copy of same in an envelope and mailing by U.S. Mail, First Class, to Defendant Pro Star Trucking,

LLC, 1545 South 4800 West, Salt Lake City, UT 84104, and by sending an exact copy of same by

Federal Express, to Defendant Pro Star Trucking, LLC, 1545 South 4800 West, Salt Lake City, UT

84104, tracking number 773924364977.

<u>/s/ Rebecca Houlding</u>
Rebecca Houlding

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